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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE NOTICE OF SUPPLEMENTAL
AUTHORITY RELATING TO
PLAINTIFFS' OPPOSITION TO
DEFENDANT ZUFFA, LLC'S MOTION
TO SEAL PORTIONS OF PLAINTIFFS'
REPLY IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION
AND RELATED MATERIALS (ECF NO.
558)**

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL AUTHORITY RELATING TO
PLAINTIFFS' OPPOSITION TO DEFENDANT ZUFFA, LLC'S MOTION TO SEAL PORTIONS OF PLAINTIFFS' REPLY
IN SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY CLASS AND RELATED MATERIALS (ECF NO. 558)**

Pursuant to Local Civil Rule 7-2(g) Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury, on behalf of themselves and all others similarly situated, hereby file this Motion for Leave to File Notice of Supplemental Authority Relating to Plaintiffs' Opposition to Zuffa, LLC's Motion to Seal Plaintiffs Reply in Support of Plaintiffs' Motion to Certify Class and Related Materials (ECF No. 558). This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities incorporated herein; the attached exhibits; the entire record in this action; and other such matters and argument as may be presented to the Court.

MEMORANDUM OF POINTS AND AUTHORITIES

On July 23, 2013, Magistrate Judge Carl W. Hoffman Jr. of the District of Nevada issued an Order denying two motions to seal documents filed in *Hunt v. Zuffa, LLC, et al.*, case no. 2:17-cv-00085-JAD-CWH ("*Hunt v. Zuffa*"). *Hunt* ECF No. 133,¹ attached hereto as Exhibit A. The court's order denied Zuffa's motion to seal certain agreements between Zuffa and UFC fighters.

In *Hunt v. Zuffa*, Zuffa asked the court to seal three types of contracts that Zuffa enters into with its fighters: Promotional and Ancillary Rights Agreements, which (a) set forth the contractual terms that govern the fighter's relationship with Zuffa, (b) provide for a set number of bouts within a given time frame, and (c) set forth the compensation amounts for each of the bouts, among other things; Bout Agreements, which are executed prior to each bout and contain information regarding the fighter's opponent and compensation, among other things; and a Letter of Agreement, under which Zuffa and a fighter agree to compensation which is not included in the bout agreement. *See* Zuffa's Motion for Leave to File, Under Seal, Exhibits 1-9, 10-11, and 16 to the Declaration of J. Colby Williams in Support of Defendants Zuffa, LLC's and Dana White's Motion to Dismiss Plaintiff Mark Hunt's Supplemental Complaint Pursuant to Fed. R. Civ. P. 23(b)(6), *Hunt* ECF No. 114 (the "Motion," attached hereto as Exhibit B).

Magistrate Judge Hoffman's Order denies the Motion, noting the distinction between sealing documents for discovery purposes and sealing judicial records:

¹ To avoid confusion between ECF numbers referring to the instant class action and ECF numbers referring to the *Hunt* litigation, the latter are referenced with the shorthand designation, "*Hunt* ECF No. ____."

In this case, while the court previously has sealed certain documents and discovery is proceeding pursuant to a protective order, defendants are now asking to seal documents related to a case-dispositive motion. Given that defendants do not articulate compelling reasons to do so, the court will deny their motions to seal without prejudice.

Hunt ECF No. 133 at 2.

In the *Le v. Zuffa* case before the Court, Zuffa similarly seeks to block the public from seeing the same types of contracts at issue in *Hunt v. Zuffa*, and other similar business records. Accordingly, the *Hunt* Order denying Zuffa's motion to seal Zuffa's Promotional and Ancillary Rights Agreements, Bout Agreements, and Letters of Agreement, provides additional support for denial of Zuffa's motion to seal herein.

Dated: July 27, 2018

Respectfully Submitted,

JOSEPH SAVERI LAW FIRM, INC.

By: /s/Kevin E. Rayhill
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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of July, 2018 a true and correct copy of **PLAINTIFFS' MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL AUTHORITY RELATING TO PLAINTIFFS' OPPOSITION TO DEFENDANT ZUFFA, LLC'S MOTION TO SEAL PORTIONS OF PLAINTIFFS' REPLY IN SUPPORT OF PLAINTIFFS' MOTION TO CERTIFY CLASS AND RELATED MATERIALS (ECF NO. 558)** was served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system.

By:

/s/ Kevin E. Rayhill